

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

In re: <b>JUAN PABLO VALDEZ</b> Debtor(s)	) ) ) )	<b>Case No. 24-12446-JDL</b> <b>Chapter 13</b>
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**2<sup>ND</sup> AMENDED DEBTOR'S OBJECTION TO TRUSTEE'S LIMITED MOTION TO  
STAY ORDER PENDING DETERMINATION OF APPEAL**

**COMES NOW** the Debtor, by and through his attorney of record, Jeffrey E. West, in the above captioned case, objects to the Limited Motion to Stay Order Pending Determination of Appeal, filed by John Hardeman, Chapter 13 Trustee on February 11, 2025, and in support thereof alleges and states as follows:

1. That the debtor filed his Voluntary Petition for Relief under Chapter 13 under the United States Bankruptcy Code on August 30, 2024. The case was confirmed on January 29, 2025.
2. Unsecured creditor, Humberto Trejo Dominguez, filed an Appeal challenging the Confirmation order in BAP No. WO-25-7 on February 5, 2025.
3. Debtor asserts that it is fundamentally unfair for the debtor to make his plan payments to the Trustee for his mortgage and the Trustee is not allowed to disburse those mortgage payments during the pendency of the Appeal. As of February 21, 2025, the debtor has paid \$4,114.14 into the plan and is paying his plan payment of \$1,796.37 in February 2025, and nothing has been disbursed. The debtor is complying with the Court's order to make the plan payments timely.
4. Debtor asserts that if the mortgage company does not receive funds, a potential Motion for Relief may be filed, and the debtor may lose his home during the Appeal process. This is unfair to the debtor and the mortgage company and in contradiction of the spirit of bankruptcy.

**WHEREFORE**, Debtors respectfully request that your Honorable Court allow the Trustee's Limited Motion to Stay Order Pending Determination of Appeal and set this

matter for a hearing on the merits and order such other and further relief as is just and proper.

Dated: March 6, 2025.

/s/ Jeffrey E. West  
JEFFREY E. WEST, OBA #18871  
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### **CERTIFICATE OF MAILING**

I certify that on the March 6, 2025, a true and correct copy of the above Objection was electronically served using the CM/ECF system, namely: John Hardeman, Chapter 13 Trustee. Further, I certify that on the March 6, 2025 copies of the Objection were forwarded via U.S. Mail, first class, postage prepaid and properly addressed to the following at the addresses shown below:

John Hardeman  
PO Box 1948  
OKC, OK 73101

Humberto Trejo Dominquez  
c/o Cody D. Kearns, Attorney for Dominquez  
110741 West 33<sup>rd</sup> Street, Suite 120  
Edmond, OK 73013

/S/ Jeffrey E. West  
JEFFREY E. WEST